

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JENNIFER L. RYAN,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
JUSTICE, *et al.*,

Defendants.

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Civil Action No. 3:25-cv-00325

Jury Trial Demanded

**PLAINTIFF’S MOTION FOR LEAVE TO FILE
NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiff Jennifer L. Ryan, appearing *pro se*, respectfully moves for leave to file the attached Notice of Supplemental Authority pursuant to Local Rule 7.1(i).

1. Plaintiff has filed a Second Amended Complaint asserting constitutional and statutory claims against the Department of Justice, FBI, FinCEN, and related actors, including claims under *Bivens*, the Federal Tort Claims Act, and 42 U.S.C. § 1985. Defendants’ motions to dismiss and objection to the SAC are pending.
2. Since Plaintiff’s filing, new and significant legal and factual authorities have become available that directly bear on the claims and defenses at issue. These include:

- **House Judiciary Committee Interim Staff Report, *Financial Surveillance in the United States: How Federal Law Enforcement Commandeered Financial Institutions to Spy on Americans*** (Mar. 6, 2024) (*Ex. A*). The March 6, 2024 House Judiciary Report further corroborates Plaintiff’s allegations that FinCEN

and the FBI engaged in zoom calls and sent directives regarding DVE labeling to financial institutions such as PayPal to target January 6th protesters and citizens with conservative views.

- **Executive Order — “Guaranteeing Fair Banking for All Americans”** (Aug. 7, 2025) (*Ex. B*), which prohibits politicized financial deplatforming and recognizes the impropriety of the practices revealed in the House Report.
- **Martin v. United States, 605 U.S. ____ (2025)** (*Ex. C*), in which the Supreme Court clarified the scope of the FTCA law-enforcement proviso, directly relevant to Defendants’ sovereign-immunity defenses.

3. Granting leave will aid the Court by ensuring that these pertinent Executive, judicial, and congressional authorities are available for its consideration of the pending motions.

WHEREFORE

Plaintiff respectfully requests that the Court grant leave to file the Notice of Supplemental Authority attached hereto as Exhibit 1.

Respectfully submitted,

Date: September 8, 2025

/s/ Jennifer L. Ryan

Jennifer L. Ryan
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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(b), I conferred with counsel for the United States regarding this Motion. On September 5, 2025, Counsel for the United States stated that the United States opposes the Motion. Accordingly, this Motion is submitted to the Court for determination.

/s/ Jennifer L. Ryan

Jennifer L. Ryan, Pro Se

CERTIFICATE OF SERVICE

I hereby certify that on September 8, 2025, I filed the foregoing document through the Court's CM/ECF system, which will send notification to all counsel of record.

/s/ Jennifer L. Ryan

Jennifer L. Ryan, Pro Se